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Comments for ET Docket 03-104

BPL if allowed would create a devastating amount of interference to users on the HF spectrum. Presently the Part 15 RFI levels generated by consumer electronics and by utility company distribution hardware are unacceptable. If BPL is implemented it will surely require high levels of RF to function over this existing bedlam of noise.

A recent proposal for a 136 KHz Amateur band was turned down.

http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-03-105A1.txt

Concern was raised about mutual interference between Amateurs and Power Company PLC systems. If a handful of low power experimenters are considered a threat to utility interests at Low Frequencies then what can the Amateur operator expect for mutual interference at High Frequencies when a neighborhood turns its AC wiring into a open, radiating, uncontrolled "communications network"?

Further technical support for my position against BPL comes in a detailed article written by *Diethard Hansen, Dr.-Ing., founder and president of Euro-EMC-Service*

<http://ce-mag.com/archive/03/ARG/hansen1.html>

<http://ce-mag.com/archive/03/ARG/hansen2.html>

Europe has had experience with BPL, as shown here that experience has not been positive.

The Amateur Service will have to deal with BPL head on. It would be implemented in our neighborhoods, in our homes where we operate. The Amateur operator has to contend with radiated interference, the BPL customer and provider will not be tolerant to an Amateur station disrupting their services. This combination may prove fatal to the Amateur community.

In my opinion this new technology cannot be made compatible with the present users in the HF spectrum. I hope the Commission will take a more objective and practical look at this proposal instead of the "advertising agency enthusiasm" it has shown.

Thank you,
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